

1 AIMEE CLARK NEWBERRY, ESQ.  
 Nevada Bar No. 11084  
 2 **CLARK NEWBERRY LAW FIRM**  
 410 S. Rampart Blvd., Suite #390  
 Las Vegas, Nevada 89145  
 T: (702) 608-4232  
 F: (702) 946-1380  
 aclarknewberry@cnlawlv.com  
 Attorney for Collegium Fund LLC Series #24

7 **UNITED STATES DISTRICT COURT**  
 8 **DISTRICT OF NEVADA**

9 COLLEGIUM FUND LLC SERIES #24, a )  
 Nevada limited liability company, )

11 Plaintiff, )

12 vs. )

13 NATIONSTAR MORTGAGE LLC d/b/a )  
 MR. COOPER; QUALITY LOAN )  
 SERVICE CORPORATION; DOE )  
 14 individuals I through XX; and ROE )  
 CORPORATIONS I through XX, )

16 Defendants. )  
 17 \_\_\_\_\_ )

CASE NO.: 2:22-CV-00321-JCM-DJA

**STIPULATION AND ORDER RE  
 FILING DEADLINES FOR  
 PLAINTIFF'S MOTION FOR  
 PRELIMINARY INJUNCTION,  
 DEFENDANT'S RESPONSIVE  
 PLEADING AND AMENDMENT TO  
 COMPLAINT**

18 On February 9, 2022, Collegium Fund LLC Series 24 ("Collegium") filed a Complaint in the  
 19 Eighth Judicial District Court, Case No. A-22-848014-C, against Defendants, Nationstar Mortgage  
 20 LLC d/b/a Mr. Cooper ("Nationstar") and Quality Loan Service Corporation ("QLS"). On February  
 21 16, 2022, Collegium filed an Ex Parte Motion for Temporary Restraining Order and Preliminary  
 22 Injunction to Enjoin Foreclosure Sale to be held on February 25, 2022. On February 16, 2022, the  
 23 Court entered an Order Setting Hearing of Ex Parte Motion for Preliminary Injunction and Temporary  
 24 Restraining Order which ordered that any opposition to the motion for preliminary injunction shall be  
 25 filed and served by February 21, 2022 (noon). No opposition was filed.  
 26  
 27  
 28

///

///

1 On February 22, 2022, Nationstar filed a Notice of Removal to Federal Court Based on  
2 Diversity Jurisdiction in the United States District Court, District of Nevada, Case no. 2:22-cv-00321.  
3 On February 24, 2022, the parties filed a stipulation to postpone the foreclosure sale pending the filing  
4 and briefing the in the normal course of Plaintiff's Motion for Preliminary Injunction, wherein the  
5 Parties further stipulated to a March 11, 2022 deadline for Plaintiff to file the Motion for Preliminary  
6 Injunction and a March 11, 2022 deadline for Defendant to file a responsive pleading to Plaintiff's  
7 Complaint. The Court issued an Order based upon the Parties stipulation on February 24, 2022.

8  
9 On March 7, 2022, Defendant's counsel notified Plaintiff's counsel via email that he  
10 discovered the Deed of Trust at issue in this case was assigned to FANNIE MAE on February 16,  
11 2022. The Parties further met and conferred via email on March 7, 8 and 10, 2022 about the matter and  
12 agreed that FANNIE MAE would be a necessary party to this case, and Plaintiff would amend the  
13 Complaint to add FANNIE MAE as a party. The parties further agreed that in light of the recent events  
14 in this case, the deadline to file the Motion for Preliminary Injunction and the deadline to file a  
15 responsive pleading to the Complaint should be extended. Accordingly, the parties stipulated as  
16 follows:  
17

- 18 1. Plaintiff shall file its Motion for Preliminary Injunction on or before April 11, 2022;
- 19 2. Defendant Nationstar shall file its responsive pleading to the Complaint on or before  
20 April 11, 2022; and,
- 21 3. Plaintiff shall amend the Complaint to name FANNIE MAE as a defendant in this  
22 action.  
23  
24  
25  
26  
27  
28

DATED this 10<sup>th</sup> day of March, 2022

**CLARK NEWBERRY LAW FIRM**

/s/ Aimee Clark Newberry

AIMEE CLARK NEWBERRY, ESQ.  
Nevada Bar No. 11084  
410 S. Rampart Blvd., Suite 390  
Las Vegas, Nevada 89145  
*Attorney for Collegium Fund LLC Series #24*

DATED this 10<sup>th</sup> day of March, 2022

**TROUTMAN PEPPER HAMILTON SANDERS  
LLP**

/s/ Brody R. Wight

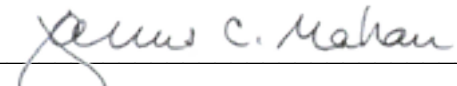
BRODY R. WIGHT, ESQ.  
Nevada Bar No. 13615  
8985 S. Eastern Ave., Ste. 200, Las Vegas,  
NV 89123 (*Nevada Office*)  
600 Peachtree St. NE #3000, Atlanta, GA  
30308 (*Corporate Office*)  
*Attorney for Nationstar Mortgage LLC, dba  
Mr. Cooper*

IT IS HEREBY ORDERED that Plaintiff shall file its Motion for Preliminary Injunction on or before April 11, 2022.

IT IS FURTHER HEREBY ORDERED that Defendant shall file its responsive pleading to the Complaint on or before April 11, 2022.

IT IS FURTHER HEREBY ORDERED that Plaintiff has leave to amend the Complaint to name FANNIE MAE as a defendant in this action.

DATED March 30, 2022.

  
UNITED STATES DISTRICT COURT

Respectfully submitted by:

**CLARK NEWBERRY LAW FIRM**

/s/ Aimee Clark Newberry

AIMEE CLARK NEWBERRY, ESQ.  
Nevada Bar No. 11084  
410 S. Rampart Blvd., #390  
Las Vegas, NV 89145  
(702) 608-4232  
*Attorney for Collegium #24*